

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HELIOS STREAMING, LLC, and)
IDEAHUB, INC.,)
Plaintiffs,)
v.) C.A. No. 19-1792-CFC-SRF
VUDU, LLC,) JURY TRIAL DEMANDED
Defendant.)
HELIOS STREAMING, LLC, and)
IDEAHUB, INC.,)
Plaintiffs,)
v.) C.A. No. 19-1978-CFC-SRF
SHOWTIME DIGITAL INC., and) JURY TRIAL DEMANDED
SHOWTIME NETWORKS INC.,)
Defendants.)

**DEFENDANTS' UNOPPOSED MOTION TO ISSUE A LETTER OF REQUEST AND
A LETTER ROGATORY FOR INTERNATIONAL JUDICIAL ASSISTANCE**

Pursuant to Federal Rule of Civil Procedure 28(b), Defendants Vudu, LLC, Showtime Digital Inc., and Showtime Networks Inc. respectfully move this Court to execute and issue: (1) the attached Letter of Request for International Judicial Assistance (“Letter of Request”) (Exhibit 1¹) pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial matters, directed to the Republic of Korea to compel testimony of named inventors located in

¹ The exhibit numbers herein refer to exhibits to Defendants' Brief in Support filed contemporaneously herewith.

Korea; and (2) the attached Letter Rogatory (Exhibit 2), directed to Japan to compel testimony of a named inventor located in Japan. Translations of the Letter of Request and Letter Rogatory (collectively, “Letters”), and their accompanying exhibits, will be submitted next week.² In executing the Letters, Defendants respectfully request that the Court sign the Letters with the Court’s seal.

The grounds for this Motion are set forth in Defendants’ Brief in Support filed contemporaneously herewith.

OF COUNSEL:

Steven Lieberman
Sharon L. Davis
Jennifer B. Maisel
Brian S. Rosenbloom
Nicole DeAbrantes
ROTHWELL, FIGG, ERNST & MANBECK, P.C.
607 14th Street, N.W., Suite 800
Washington, DC 20005
(202) 783-6040

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (No. 1014)
Andrew M. Moshos (No. 6685)
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
amoshos@morrisnichols.com
Attorneys for Defendant Vudu, LLC

² When Defendants indicated to the Court on the February 24, 2021 teleconference that they would be filing the motion this week, Defendants understood that the certified translations of the relevant papers would be completed in time. However, the translators require more time than they originally anticipated. Defendants will submit a letter to the Court attaching the translated documents for the Court to sign as soon as the translations are complete at some point next week.

OF COUNSEL:

Edward R. Reines
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065-1175
(650) 802-3000

William Sutton Ansley
WEIL, GOTSHAL & MANGES LLP
2001 M Street NW, Suite 600
Washington, DC 20036
(202) 682-7018

Dated: March 5, 2021

/s/ Andrew E. Russell

John W. Shaw (No. 3362)
Karen E. Keller (No. 4489)
Andrew E. Russell (No. 5382)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
kkeller@shawkeller.com
arussell@shawkeller.com
Attorneys for Defendants Showtime Digital Inc. and Showtime Networks, Inc.